

UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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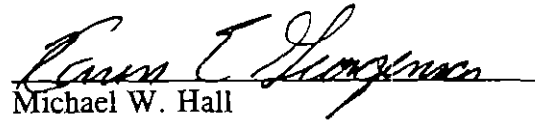
POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

THE BROOKLYN UNION GAS COMPANY
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE WITNESS:
PHILIP HATFIELD (USPS-T-25)

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission ("Commission"), The Brooklyn Union Gas Company ("Brooklyn Union"), by its attorneys, Cullen and Dykman, hereby submits the following Interrogatories and Requests for Production of Documents.

Respectfully submitted,

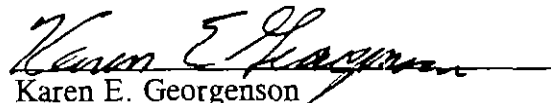


Michael W. Hall
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Cullen and Dykman
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(202) 223-8890

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Dated at Washington, D.C., this 22 day of August, 1997.



Karen E. Georgenson

**THE BROOKLYN UNION GAS COMPANY
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE WITNESS:
PHILIP HATFIELD (USPS-T-25)**

Instructions and Definitions: In answering the following interrogatory, please refer to the instructions and directions attached to the interrogatories and requests for production of documents directed to USPS Witness Michael Miller.

BUG/USPS-T-25-1 You show the business mail entry unit cost under cost pool LDC 79 on USPS-T-25, Appendix V, page 3. What is the unit cost and productivity for culling, facing and canceling stamped mail that is not entered in bulk? Please provide the source for your answer.